

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

NAUTILUS INSURANCE COMPANY,

Plaintiff,

v.

RICHARD ALEXANDER MURDAUGH,  
SR., CORY FLEMING, MOSS & KUHN,  
P.A., CHAD WESTENDORF, and  
PALMETTO STATE BANK,

Defendants.

C/A No.: 2:22-cv-1307-RMG

**NAUTILUS INSURANCE COMPANY'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION TO RICHARD  
ALEXANDER MURDAUGH, SR.**

**TO: COUNSEL OF RECORD FOR RICHARD ALEXANDER MURDAUGH, SR.**

Plaintiff Nautilus Insurance Company, pursuant to Rule 34 of the Federal Rules of Civil Procedure, requests that Defendant Richard Alexander Murdaugh, Sr., produce and permit the Plaintiff or its attorneys acting on its behalf, to inspect and copy the following designated documents, which are in the possession, custody, or control of the Defendant herein within thirty (30) days of the date of service hereof.

**REQUESTS FOR PRODUCTION**

Please produce:

1. A copy of every canceled check written to Gloria Satterfield from any bank account on which you had an ownership interest from January 1, 2015 – February 2, 2018.
2. A copy of the check or canceled check written to Gloria Satterfield that was to be collected on February 2, 2018.
3. All materials you produced in response to a subpoena—including from the South Carolina Office of Disciplinary Counsel, South Carolina Law Enforcement Division, the Federal Bureau of Investigation, the United States Attorney's Office, or any other person or entity—in connection with investigations into Alex Murdaugh, Cory Fleming, and/or Russell Laffitte.

4. All communications<sup>1</sup> with Cory Fleming regarding the Satterfields and/or the Satterfield Claim<sup>2</sup> from January 1, 2017 to present.
5. All correspondence or recorded communications with anyone—including Brian Harriott, Michael Anthony Satterfield, Lynn Davidson, Chad Westendorf, Cory Fleming, Russell Laffitte, any employee or agent of Palmetto State Bank, any employee or agent of Moss & Kuhn, P.A. (formerly Moss, Kuhn & Fleming, P.A.)—regarding the Satterfield Claim.
6. All communications with Russell Laffitte regarding loans made to you or to Mr. Laffitte from funds belonging to any of your clients.
7. Cell phone records showing the date, time, and duration of calls to or from Russell Laffitte and/or Cory Fleming from January 1, 2015 to July 1, 2021.
8. All records, including bank statements and notices, relating to the banks account(s) You opened in the name of “Forge.”
9. Your complete file relating to your representation of the family of Hakeem Pinckney, including all communications between you and Cory Fleming or Russell Laffitte relating to the same or relating to Cory Fleming’s representation of Pamela Pinckney.
10. All records reflecting the receipt or disbursement of funds relating to your representation of the family of Hakeem Pinckney.

In addition, please:

11. Permit entry onto and inspection of Moselle by Nautilus’ representatives pursuant to Rule 34(a)(2), F.R.C.P. within thirty (30) days of service of these requests.

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<sup>1</sup> “Communications” as used in these requests refers to any form of recorded communication, written or otherwise, including but not limited to letters, emails, direct messages, instant messages, messages through internet services or apps, voicemails, audio recordings, or any other means of transmission.

<sup>2</sup> As used in these requests, the “Satterfield Claim” refers to the putative claim made against the primary and excess policies issued to you by Brit and Nautilus following the death of Gloria Satterfield.

This 19<sup>th</sup> day of August, 2022  
Charleston, South Carolina

/s/ Jaan Rannik  
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*COUNSEL FOR NAUTILUS INSURANCE COMPANY*